

REMARKS

I. Introduction

In response to the Office Action dated August 5, 2008, which was made final, and in conjunction with the Request for Continued Examination (RCE) submitted herewith, claims 3, 4, 8, 9, 13 and 14 have been canceled, and 1, 6 and 11 have been amended. Claims 1, 5-6, 10-11 and 15 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

II. Prior Art Rejections

In paragraphs (4)-(5) of the Office Action, claims 1, 3-6, 8-11, and 13-15 were rejected under 35 U.S.C. §103(a) as being unpatentable over Bonney et al., U.S. Patent No. 6,466,953 (Bonney) in view of Harrison et al., U.S. Patent No. 6,611,725 (Harrison).

Applicants' attorney respectfully traverses these rejections.

Independent claims 1, 6 and 11 recite limitations not shown by the combination of references. Specifically, the independent claims recite that the Sheet Set Manager includes a Transmittal and Archive function for automatically packaging, communicating and storing the Sheet Set, Subsets and Sheets, and associated files, as a cohesive unit, such that the Transmittal and Archive function automatically collects all files related to the Sheet Set, Subsets and Sheets, automatically extracts and bundles referenced files related to the Sheet Set, Subsets and Sheets, and automatically bundles support files necessary to view and edit the Sheets, including finding a first set of files that store the Sheet Set, Subsets and Sheets, finding a second set of library files that are required to continue working on the Sheet Set, and packaging together the first and second set of files for communication and storage.

Bonney merely describes hierarchical drawing sheet management. However, as admitted by the Office Action, Bonney does not teach or suggest a Transmittal and Archive function performing in the same manner as recited in Applicants' independent claims. Nonetheless, the Office Action asserts that Harrison teaches the Transmittal and Archive function of Applicants' claims.

Applicants' attorney disagrees.

Consider the cited portions of Harrison, which are set forth below:

Harrison: Abstract

A method for processing a design model generated by a computer aided design system includes **accessing model data that includes separately stored data documents detailing construction of the design model from a collection of components**, processing the model data to generate image elements representing a projected view of the design model and to generate tag data associating each of the image elements with at least one of the of components and **storing the first image elements and the first tag data in a drawing document**. **Supplementary data can be added to the drawing** without the need for the external components to be available on disk or in memory. An updated drawing document can be generated following a change to one of the components. Generating an updated drawing document includes generating tag data that identifies matchings between the original and changed model components. **Annotations and other supplementary data can be attached to image elements and stored in drawing documents**. These annotations can be retained when the updated drawing document is produced. Methods of the invention can be implemented in software in a computer system.

Harrison: col. 2, lines 30-58

In general, in one aspect, the invention features a computer-implemented method for processing a design model generated by a computer aided design system. The method includes **accessing model data (which includes a collection of separately stored data documents that detail construction of the design model from a collection of components)**, processing the model data to generate image elements representing a projected view of the design model and to generate tag data associating each of the image elements with at least one of the model components, and **storing the image elements and the tag data in a drawing document**.

In general, in another aspect, the invention features a computer-implemented method for processing a drawing document generated by a computer aided design system. **The drawing document includes image elements (e.g., vector drawing data) that can be rendered to display a 2D projected view of a 3D model and tag data associating each image element with components of the design model (with at least two of the components referenced by the tag data being specified in separately stored data documents)**. The method includes processing the drawing document to display the view of a design model on a computer display terminal, receiving a user input selecting one of the image elements, receiving supplementary data, and linking the supplementary data to one of the model components based on the tag data associating the selected image element with the first model component.

Harrison: Claim 8

8. The method of claim 1 further comprising: processing the model data to generate a second plurality of image elements representing a second projected view of the design model that is different from the first projected view and to generate second tag data associating each of the second image elements with at least one of the components; and storing the second plurality of image elements and the second tag data in a drawing document.

Harrison: col. 4, lines 1-5 (actually, col. 3, line 63 – col. 4, line 13)

Implementations may include one or more of the following advantages. A user can send a drawing file to another CAD user without sending associated model files (i.e., model component files), while still permitting the other CAD user to annotate and change the model file. Annotations to a drawing file can be automatically maintained and updated as underlying model data is changed. Annotations in a drawing document can be fully associative (i.e. the annotations remain attached to particular structural features of the model when the drawing document changes in response to model changes). Drawing documents can be opened, and annotations can be attached to structural features of a 3D model without requiring access to other model documents. Users can control when a drawing is updated to the model (i.e. the synchronization process of the drawing documents is responsive may be controlled by the user). In other implementations, the synchronization process may be automatic.

Applicants' attorney submits that the cited portions of Harrison do not teach or suggest a Transmittal and Archive function for automatically packaging, communicating and storing the Sheet Set, Subsets and Sheets, and associated files, as a cohesive unit, such that the Transmittal and Archive function automatically collects all files related to the Sheet Set, Subsets and Sheets, automatically extracts and bundles referenced files related to the Sheet Set, Subsets and Sheets, and automatically bundles support files necessary to view and edit the Sheets, including finding a first set of files that store the Sheet Set, Subsets and Sheets, finding a second set of library files that are required to continue working on the Sheet Set, and packaging together the first and second set of files for communication and storage.

Instead, the cited portions of Harrison merely describe (1) accessing model data (which includes a collection of separately stored data documents that detail construction of the design model from a collection of components), (2) processing the model data to generate image elements representing a projected view of the design model and to generate tag data associating each of the image elements with at least one of the model components, and (3) storing the image elements and the tag data in a drawing document or file. Indeed, the cited portions of Harrison describe sending only this drawing document to another CAD user without sending associated model files (i.e., model component files).

Consequently, the combination of references does not teach or suggest all the limitations of Applicants' independent claims. Specifically, Harrison does not collect all files related to a Sheet Set, Subsets and Sheets, Harrison does not automatically extract and bundle referenced files related to the Sheet Set, Subsets and Sheets, Harrison does not automatically bundles support files necessary to

view and edit the Sheets, Harrison does not find a first set of files that store the Sheet Set, Subsets and Sheets, Harrison does not find a second set of library files that are required to continue working on the Sheet Set, and Harrison does not package together the first and second set of files for communication and storage.

Moreover, the various elements of Applicants' claimed invention together provide operational advantages over Bonney and Harrison. In addition, Applicants' invention solves problems not recognized by Bonney and Harrison.

Thus, Applicants' attorney submits that independent claims 1, 6 and 11 are allowable over Bonney and Harrison. Further, dependent claims 5, 12 and 15 are submitted to be allowable over Bonney and Harrison in the same manner, because they are dependent on independent claims 1, 6 and 11, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 5, 12 and 15 recite additional novel elements not shown by Bonney and Harrison.

III. Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited.

Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

GATES & COOPER LLP
Attorneys for Applicants

Howard Hughes Center
6701 Center Drive West, Suite 1050
Los Angeles, California 90045
(310) 641-8797

Date: November 5, 2008

GHG/

G&C 30566.320-US-01

By: /George H. Gates/
Name: George H. Gates
Reg. No.: 33,500